

Joint Status Report Pursuant to Rule 26(f)

Caption: Leon Weingrad, individually and on behalf of all others similarly situated v. Baker Solutions Inc. d/b/a CreditBaker

Civil Action No: 2:25-cv-01792-GJP

Basis of Jurisdiction: Federal Question

Jury Trial: X Non-Jury Trial: _____ Arbitration: _____

Plaintiff's counsel participating in the Rule 16 Conference: Andrew Perrong

Defendants counsel participating in the Rule 16 Conference: Richard J. Perr and Monica M. Littman

Do counsel have full authority to settle at Rule 16 Conference? Counsel for Plaintiff and Counsel for Defendant have settlement authority.

If not, client with such authority who will attend conference:

When did the parties hold the Rule 26 Conference? May 23, 2025

When did the parties comply with the Rule 26(a)'s duty of self-executing disclosure? Plaintiff served Initial Disclosures on June 28, 2025. Defendant will serve its Initial Disclosures by July 3, 2025.

Does either side expect to file a case-dispositive motion? (yes/no) Plaintiff – yes. Defendant – yes.

If yes, under what Rule? Plaintiff – Rule 23. Defendant – Rule 56 – Motion for Summary Judgment.

If yes, specify the issue. Plaintiff – Class Certification. Defendant will be filing a Motion for Summary Judgment on the grounds that there was consent and Defendant did not engage in marketing or solicitation. Defendant responded to Plaintiff's request for a loan application.

Proposed deadline for filing dispositive motions: February 3, 2026

Does either side anticipate the use of experts? Plaintiff yes. Defendant would retain an expert if Plaintiff retains an expert.

If yes, what is the proposed deadline for expert discovery? January 2, 2026

Approximate date case should be trial-ready: March 2026

Time for Plaintiff's case: 2-3 days Time for Defendant's case: 3-4 days

Is a settlement conference likely to be helpful? _____ If so, when:

Early _____ (yes/no) After Discovery Yes (yes/no)

Do the parties wish to proceed before a Magistrate Judge for final disposition? No.

Plan for Discovery:

1. The parties anticipate that discovery should be completed within 180 days.
2. What is the minimum amount of time necessary to complete discovery prior to an ADR session, should one be ordered or agreed to? 90-120 days
3. Have the parties discussed issues relating to claims of privilege or of protection as trial-preparation material, as required by Rule 26(f)(3)(D)? Yes
4. Identify any other discovery issues which should be addressed at the Rule 16 Conference, including limitations on discovery, protective Orders needed, or other elements which should be included in a particularized discovery plan. Plaintiff does not have any issues. Defendant intends on asserting objections to discovery seeking "class" information as there are no class members. Defendant does not engage in marketing or solicitation. The National Do Not Call Registry does not apply.
5. If you contend the discovery period to exceed 90 days, please state reason: This is a complex, putative class action with call records in possession of third parties.
6. Do the parties anticipate the need to subpoena any third parties? Yes
If yes, to the extent any authorizations or releases are required to be signed, counsel should exchange them in advance of the Rule 16 Conference.